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May 29, 2025

VIA ECF

Hon. Judge Jesse M. Furman
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Rodriguez et al v. Produce Experience Inc. et al
Docket No.: 25-cv-01363-JMF

Your Honor:

We represent Plaintiffs in the above referenced matter and write, on behalf of the parties, to respectfully request a thirty-day extension of the deadline to submit settlement papers to the Court, currently scheduled for May 22, 2025. The new deadline would be June 21, 2025. This is the first request of its kind and is submitted on consent. We apologize for the tardiness of this request.

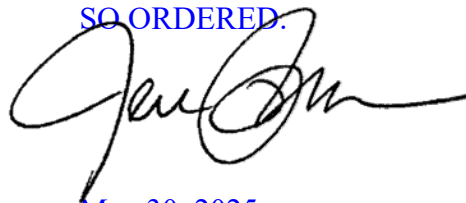
The parties will not be submitting an agreement to the Court for review but will rather be submitting an offer of judgment (the "Offer") and acceptance to the Court pursuant to *Mei Xing Yu v. Hasaki Rest., Inc.*, 944 F.3d 395, 398 (2d Cir. 2019). The parties anticipate needing an additional several weeks to finalize the Offer and acceptance and file them on the docket.

Respectfully submitted,

/s/Jesse Barton
Jesse Barton, Esq.

Application GRANTED. The Clerk of Court is directed to terminate ECF No. 38.

SO ORDERED.



May 30, 2025